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Date: Tue, Oct 25, 2005 12:00 AM
Subject: ACP DEIS comments

COMMENTS ON DEIS NUREG-1834

1. Decontamination and decommissioning costs - In table 7-1 it estimates decontamination and decommissioning costs to be \$435 million. There is not a breakdown in the appendix of how this figure was determined and more investigation needs to be done and shared with the public. Taxpayers have almost totally funded these costs for the former facility's operation at the DOE site to the tune of \$300,000,000 (million) annually. The figure provided in this table would not be sufficient. USEC is a private business, generally believed to be in poor financial standing, that recently laid off 150 employees. Approximately the same number of "new" jobs we have been told will be employed in Pike County by the new facility. Taxpayers need solid assurance that we will not be left holding the bag if the facility is shut down, or does not have sufficient funding set aside to cover D&D costs and long term storage and monitoring of radioactive waste it is responsible for generating. How much taxpayer funding is currently being spent to do this work at Paducah and other sites? \$435 million does not reflect the reality of what we are seeing at Piketon. It is grossly inadequate. Since the DOE owns the site that USEC would be operating from, if the company folds, taxpayers would be left with this expense and that is unacceptable.

This table also does not include any cost analysis for long term waste storage. Serious consideration needs to be given and provision made in advance as this is the most expensive cost involved in D&D. The \$300 million taxpayers are currently paying for clean-up does not even begin to touch long-term storage, monitoring, and safety precautions. I asked the DOE for a total of how much taxpayer funding has been spent to date on clean-up, but have never received that information.

The report lists Envirocare as being able to accept unlimited amounts of low-level waste. This contract needs to be signed in advance and paid for. Envirocare is currently accepting so much radioactive waste that they cannot accommodate it - it is being stacked by the side of the road and left for processing. I do not have confidence that by the time this waste is ready to be shipped from Piketon and all of the other sites that are utilizing this landfill have sent what they have there that there will be enough space to accept what USEC would generate and Ohio would be left in the same position it's in now - a stockpile of radioactive waste. This is an environmental hazard and creates a terrorist target in SE Ohio. I sent questions on this earlier to the NRC and was told that the correspondence would be included for consideration in the DEIS, so I won't repeat all of the questions I sent previously.

2. Water resources- The last published DOE annual report for site cleanup progress documented plutonium contamination and several uranium isotopes found in fish sampled in streams known to be fishing holes for local people - all supposedly at "safe" consumption levels. I had not known previously that there was a safe level of plutonium for human consumption. Uranium was also found in the liver of a deer that had been tested from on site. Currently there is a 3-strand barbed wire fence surrounding the facility. This is not sufficient to keep contaminated water traveling off site, or keeping deer and other wildlife from traveling back and forth, even though the deer hunt was canceled that year. Not much against assurance against potential terrorist entry, either.

A resident that I spoke with told me that he had seen eagles returning to the area, flying over the site boundaries, and feeding from radioactive landfills. What protection is being provided for them, and for people in communities where they may travel off site aside from hunting to die, leaving radioactive contamination to accumulate off-site?

The draft states that groundwater withdrawals would increase by 10 percent over current usage rates, where is it being released? It says that USEC does not anticipate any liquid discharges or radioactive materials from the proposed ACP. What protection or provision is being provided in case of unplanned releases, etc., that may contaminate the water and wildlife traveling on and off-site differently than what

was done before? It was apparently inadequate and needs to be addressed. The barbed-wire fence isn't working. Does this study take into account the current level of contamination and that what USEC contributes will be additional?

3. Transportation impacts - With the US having only 2% of the world's uranium reserves, I believe any meaningful examination of transport of this material needs to include transportation of uranium to the USEC facility from overseas sites it would be coming here from. We had a shipment of uranium for Libya a short time ago and when I asked why this was not included in the EIS for the facility, or UDS facility, they said it was shipped here as a matter of national security and was exempt from that process. Without environmental impact consideration, I believe presents a threat to the security of the communities it is transported across. I know that NRC provides waivers in cases of national security, but if we already know that there is a limited amount of uranium to work with in the US, I believe it is safe to assume some will be coming from overseas, and these impacts need to be considered in the overall picture. I don't see adequate analysis of this in the current DEIS.

I live in an area where coal fired power plants are negatively impacting my community. What electricity is going to be required for USEC's operation? Is EIS being done for our communities from coal-fired power plants? We already have high rates of asthma and cancer. The Gavin plant has been converted to residential use and is no longer available. The first centrifuge took the same amount of electricity to operate as the city of Los Angeles. Where will the energy come from to run ACP, who is paying for its construction costs, and how will its operation impact those communities?

No license should be granted for the larger-scale commercial facility under any circumstances until the experimental facility has been constructed, is operating, and proven to be safe and within a realistic budget that USEC can adhere to so that taxpayers are not forced to subsidize private industry. All D&D and long term storage costs should be paid into an account in advance to insure USEC covers these costs.

I have not been able to read through the entire DEIS, and would like additional time to look at the document and submit comments if that is possible.

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